

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION**

A&J MANUFACTURING, LLC,	)	
a Georgia corporation, and	)	
	)	
A&J MANUFACTURING, INC.,	)	
a Florida corporation,	)	
	)	
Plaintiffs,	)	Civil Action No.
	)	2:13-cv-00121-LGW-JEG
	)	
v.	)	
	)	
RANKAM GROUP,	)	
a California corporation,	)	
	)	
Defendant.	)	

**JOINT MOTION FOR ORDER SUBSTITUTING DEFENDANTS,  
GRANTING LEAVE TO AMEND ANSWER, AND STAYING THE CASE**

Plaintiffs A&J Manufacturing, LLC and A&J Manufacturing, Inc. (collectively, “the A&J entities”) and Defendant Rankam Group hereby jointly move the Court for an Order substituting Rankam Metal Products Manufactory Limited, USA (“Rankam”) as the defendant in place of Rankam Group, as the real party in interest under Rule 17 of the Federal Rules of Civil Procedure. The same substitution has been effected in the proceeding before the United States International Trade Commission, styled *In re Certain Multiple Mode Outdoor*

*Grills and Parts Thereof*, Investigation No. 337-TA-895 (hereafter referred to as “The ITC Action”).

The parties also jointly request, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, that Defendant Rankam be granted leave to amend its Answer and Counterclaim, filed on December 6, 2013, to correct the name of the Defendant and Counterclaim Plaintiff to “Rankam Metal Products Manufactory Limited, USA.” The amended Answer and Counterclaim would be in the form attached hereto as Exhibit “A.”

The parties jointly request that the Court enter a stay of this case, effective after Rankam’s amended answer and counterclaim is filed, pending the final resolution of the ITC Action, involving the same patents at issue in this litigation, with any party having the right to move to lift the stay based on the future actions of any party or future developments in the ITC Action.

A proposed order is attached as Exhibit “B” for the Court’s consideration.

Respectfully submitted, this 10th day of January, 2014.

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ATTORNEYS FOR PLAINTIFFS  
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A&J MANUFACTURING, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing **JOINT MOTION FOR ORDER SUBSTITUTING DEFENDANTS, GRANTING LEAVE TO AMEND ANSWER, AND STAYING THE CASE** with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all counsel of record by e-mail.

Dated: January 10<sup>th</sup>, 2014

/s/ John W. Harbin